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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 09 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Courtney M. Price  
Vice President, CHEMSTAR  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209

Dear Ms. Price:

Thank you for your letter dated March 21, 2000, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter expresses disappointment in EPA's January 5, 2000, letter which denied the DNT Panel's request to have four DNT isomer specific CAS numbers designated as "no longer HPV." Those chemicals were 2,3-DNT (CAS No. 602-01-7), 2,6-DNT (CAS No. 606-20-2), 3,4-DNT (CAS No. 610-39-9), and 2,5-DNT (CAS No. 619-15-8). The letter then provides additional information to support the request that these chemicals be designated as "no longer HPV."

As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its ChemRTK website at [www.epa.gov/chemrtk](http://www.epa.gov/chemrtk) in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that 2,3-DNT (CAS No. 602-01-7), 2,6-DNT (CAS No. 606-20-2), 3,4-DNT (CAS No. 610-39-9), and 2,5-DNT (CAS No. 619-15-8) **do meet** the "no longer HPV" criteria. The HPV Challenge Program Chemical List will be annotated by designating this chemical with a "5" to indicate that they are "no longer HPV."

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the

TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201